



USEPA - Region 2

SDMS Document



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Proposed Plan Superfund Update

Hooker Chemical/Ruco Polymer Site Hicksville, New York

July 1990

EPA ANNOUNCES PROPOSED PLAN

This Proposed Plan identifies the preferred option for cleaning up soils contaminated with Polychlorinated Biphenyls (PCBs) at the Hooker Chemical/Ruco Polymer site. In addition, the Plan includes summaries of other alternatives analyzed for this site. This document is issued by the U.S. Environmental Protection Agency (EPA), the lead agency for site activities, with the concurrence of the New York State Department of Environmental Conservation (NYSDEC). EPA, in consultation with NYSDEC, will select a final remedy for the site only after the public comment period has ended and the information submitted during this time has been reviewed and considered.

EPA is issuing this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the Comprehensive Environmental

Response, Compensation and Liability Act (CERCLA). This document summarizes information that can be found in greater detail in the Focused Feasibility Study (FFS) and other documents contained in the administrative record for this site. EPA and the State encourage the public to review these other documents to gain a more comprehensive understanding of the site and Superfund activities that have been conducted there. The administrative record, which contains the information upon which the selection of the response action will be based, is available at the following locations:

Town of Oyster Bay
Clerks Office
54 Audrey Avenue
Oyster Bay, New York 11771
(516) 922-5800
Hours: Mon - Fri, 9:00 - 4:30

Hicksville Public Library
169 Jerusalem Avenue
Hicksville, New York 11801
(516) 931-1417
Hours: M-F 10-9, Sat 10-5

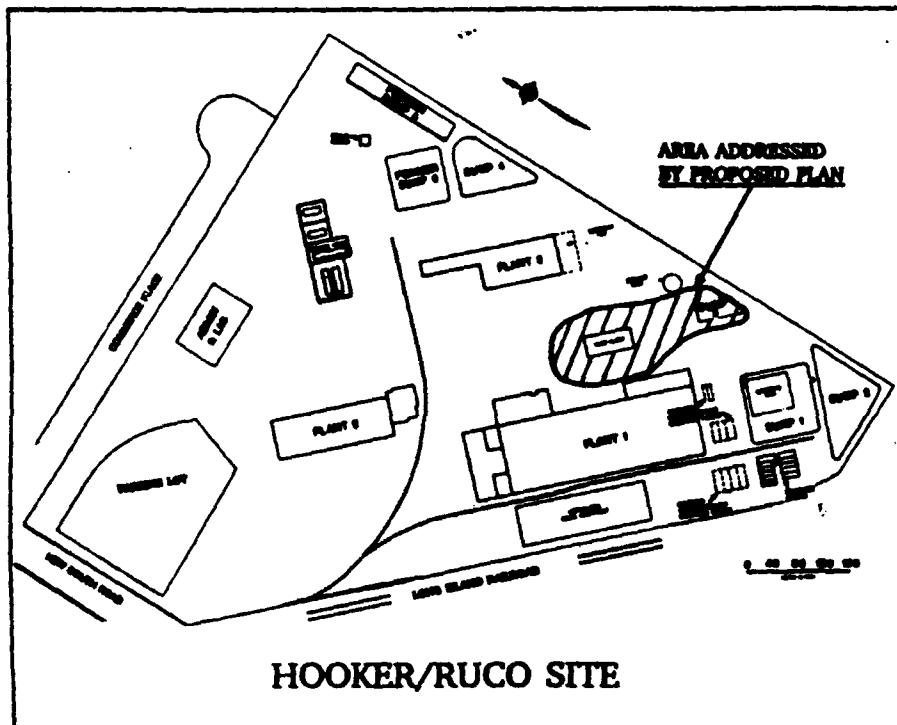
and

U.S. EPA - Region II
26 Federal Plaza
New York, New York 10278
(212) 264-7508
Hours: Mon - Fri, 8:30 - 4:30

SITE BACKGROUND

The site, located off of New South Road, has been used for industrial purposes since 1946. At that time two companies occupied the site; the Insular Chemical Company and the Rubber Company of America. Although two separate corporations, they shared the same pilot plant. In 1956 the two companies merged into the Rubber Corporation of America. In 1956, the company was purchased by the Hooker Chemical and Plastics Corporation (a subsidiary of Occidental Chemical) and was known as the Ruco Division. In March 1982, the employees bought the company and it became known as Ruco Polymer Corporation.

Since 1946, the facility was used for the production of various polymers, including polyvinyl chloride (PVC),



HOOKER/RUCO SITE

Dates to remember MARK YOUR CALENDAR

July 31 - August 30, 1990:
Public comment period on
remedies to clean up PCB-
contaminated areas.

August 7, 1990:
Public meeting at the Town
of Oyster Bay Town Hall,
Oyster Bay, NY at 7:30 pm.

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styrene/butadiene latex, vinyl chloride/vinyl acetate copolymer, and polyurethane, as well as ester plasticizers. This facility is currently active, and manufactures such products as polyester, polyols and powder coating resins.

During site operations between 1956 to 1975, industrial wastewater from the facility was discharged to six (6) on-site sumps. This wastewater contained, among other things, vinyl chloride, trichloroethylene, barium and cadmium soap, vinyl acetate, organic acids, and styrene condensate. As a result of these releases, groundwater downgradient from the site has been contaminated. Currently, only non-contact cooling water is discharged into Sump 4. Since 1975, a concrete settling basin has been used to store ester waste prior to being incinerated on-site. Hazardous wastes are stored in drums on-site until they are disposed of at a permitted off-site facility.

From 1946 to 1978, the pilot plant used a heat transfer fluid called Therminol, which contained PCBs. During the operation of the facility, there was a release of PCBs to the soil adjacent to the pilot plant. Some of this contaminated soil was spread to surrounding areas by surface-water runoff, sediment transport, and truck traffic. Occidental has conducted several investigations, since 1984, to determine the extent of PCB contamination around the pilot plant. In 1989, an underground fuel oil storage tank adjacent to Plant 1 was removed, and the soils surrounding the tank were excavated, sampled, and found to be contaminated with PCBs. These excavated soils have been covered with plastic sheeting, pending the remediation of the other PCB-contaminated soils on the site.

The site was placed on the National Priorities List (NPL) in 1984. Initially, negotiations by NYSDEC and EPA failed to reach a settlement with the potentially responsible parties (Occidental Chemical and Ruco Polymer) to conduct the Remedial Investigation and Feasibility Study (RI/FS) for the site. Therefore, EPA issued a work assignment to its contractor, Ebasco Services, Inc., to prepare a work plan and conduct the RI/FS. However, in September 1988, after the work plan was finalized, Occidental agreed to perform the work. In September 1989, RI/FS field work commenced for the RI/FS. Field work

was completed in February 1990 and a draft Remedial Investigation Report was submitted in April 1990. This report is currently under review by EPA and NYSDEC.

Given that the PCB-contaminated areas had been defined by previous investigations, Occidental proposed to perform an early action to remediate these areas. To support such an action, Occidental prepared a Focused Feasibility Study which analyzes alternatives to address the PCB-contaminated areas on the site.

SCOPE AND ROLE OF ACTION

The contamination at the Hooker/Ruco site has been separated into two distinct remedial actions or "operable units (OUs)." This proposed plan is for the second OU. The two OUs are divided as follows:

- o OU One: The majority of the site; soil and groundwater contamination from previous disposal activities.

- o OU Two: PCB-contaminated soils surrounding the pilot plant.

As stated above, the draft Remedial Investigation for OU One was submitted in April 1990 and is under review by EPA and NYSDEC. It is expected that some additional field work will be necessary prior to completing a Feasibility Study. It is expected that it will be approximately one year before EPA selects a remedy for the first OU.

The second OU addresses a portion of the site for which the nature and extent of contamination was previously defined and the technologies for treatment are different from the rest of the site. Therefore, remedial action for OU 2 can be started before the OU 1 RI/FS is completed. The FFS for OU 2 addresses four areas of PCB-contaminated soils, surrounding the pilot plant. They are: 1) the direct spill area; 2) transport related areas; 3) the previously excavated soils; and, 4) the impacted recharge basin.

The estimated volumes of PCB-contaminated soils associated with each concentration range are as follows:

10 ppm - 25 ppm	=	410 cu.yds.
25 ppm - 500 ppm	=	664 cu.yds.
above 500 ppm	=	36 cu.yds.

Thus, the total volume of PCB-contaminated soils with PCB

concentrations exceeding 10 ppm is estimated to be 1,110 cubic yards. For an action level of 25 ppm, it is estimated that a total of 700 cubic yards would need to be excavated.

SUMMARY OF SITE RISKS

EPA conducted an Endangerment Assessment (EA) to estimate the risks associated with the PCB-contaminated area. The baseline risk assessment estimates the health or environmental problems which could result if the PCB-contamination at the Hooker/Ruco site was not cleaned up. In conducting this assessment, the focus was on the health effects that could result from exposure to PCB-contamination as a result of contaminated soil coming into contact with the skin, from ingestion of the soil, and/or inhalation of PCBs that are carried by dust. PCBs are known to cause cancer in laboratory animals, and are suspected to be human carcinogens. Drinking water pathways were not evaluated because PCBs do not migrate readily, especially through groundwater.

The Endangerment Assessment determines that the risk from exposure to the PCB-contaminated soil is the greatest for employees of the Ruco Polymer facility (site workers). Using the reasonable maximum exposure (RME) scenario, the EA estimates the risk to site workers to be 5.9×10^{-4} . This means that if no cleanup action is taken, one additional person per 170 people working at the site is at risk of developing cancer as a result of exposure to PCB contamination at the site. The average case exposure scenario (a more realistic scenario) estimates the risk to be 3.7×10^{-4} , or one additional person per 2670 site workers. The EA calculated that after remediation, with a cleanup goal of 10 ppm, the RME risk level would be 2.7×10^{-5} , or one additional person per 37030 site workers. This falls within the risk range of 10^{-4} to 10^{-6} , which EPA uses for cleanups at Superfund sites.

SUMMARY OF ALTERNATIVES

The alternatives analyzed for OU Two are presented below. These are numbered to correspond with numbers in the FFS Report. The alternatives evaluated for addressing the PCB contaminated soil are the following:

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Alternatives

- 1: No Action
- 2: In-situ Containment
- 3: Off-site Landfilling of Soils in Excess of 25 ppm
- 4: Off-site Landfilling of Soils in Excess of 25 ppm; Thermal Destruction of Soils in Excess of 500 ppm
- 5: On-site Bioremediation of Soils in Excess of 25 ppm
- 6: On-site Bioremediation of Soils in Excess of 25 ppm; Thermal Destruction of Soils in Excess of 500 ppm
- 7: On-site Thermal Destruction of Soils in Excess of 25 ppm
- 8: Off-site Thermal Destruction of Soils in Excess of 25 ppm
- 9: Off-site Landfilling of Soils in Excess of 10 ppm
- 10: Off-site Landfilling of Soils in Excess of 10 ppm; Thermal Destruction of Soils in Excess of 500 ppm
- 11: On-site Bioremediation of Soils in Excess of 10 ppm
- 12: On-site Bioremediation of Soils in Excess of 10 ppm; Thermal Destruction of Soils in Excess of 500 ppm
- 13: On-site Thermal Destruction of Soils in Excess of 10 ppm
- 14: Off-site Thermal Destruction of Soils in Excess of 10 ppm

Common Elements. Except for the "No Action," alternative, all of the alternatives have a number of common components. Alternatives 3 through 14 all involve excavating PCB-contaminated soils, in excess of a specified cleanup level, prior to treatment or off-site disposal. Confirmatory sampling will be conducted to ensure that the cleanup level has been achieved. Excavation in the direct spill area will probably require the use of sheet piling. In addition, in alternatives 3 through 14, excavated areas will be backfilled with clean fill, and then these areas, except for the recharge basin, will be paved with asphalt.

Alternative 1: NO ACTION

Capital Cost: \$49,000
Annual Operation and Maintenance (O&M) Costs: \$3,000
Present Worth: \$139,000
Time to Implement: 12 months

The Superfund program requires the "no-action" alternative be evaluated at every site to establish a baseline for

comparison. Under this alternative, fencing would be installed to limit access to contaminated soils. Deed restrictions would be obtained to maintain industrial restricted use for this and adjacent land (up to 330 feet from the contaminated areas). Monitoring would be conducted to assess the migration of contamination.

Alternative 2: IN-SITU CONTAINMENT

Capital Cost: \$75,640
Annual O&M Costs: \$1,000
Present Worth: \$105,640
Time to Implement: 12 months

All soils containing in excess of 10 ppm of PCBs (approximately 7,700 square feet) would be covered with twelve inches of clean soil, and then would be paved with a three inch layer of asphalt. The recharge basin would be filled and capped similarly. A new recharge basin would be constructed to replace the existing one. The costs above include replacement of the asphalt after 15 years. Bi-annual inspections would be performed for a 30-year period to ensure that the cap is maintained in good condition. Deed restrictions would be obtained to maintain adjacent property as an industrial restricted area.

Alternative 3: OFF-SITE LANDFILLING OF SOILS IN EXCESS OF 25 PPM

Capital Cost: \$639,914
Annual O&M Costs: \$1,000
Present Worth: \$669,914
Time to Implement: 13 months

All soils in excess of 25 ppm would be excavated from the site and hauled to a chemical waste landfill permitted under the Toxic Substances Control Act (TSCA). Soils in excess of 10 ppm would be capped as in Alternative 2. Deed restrictions would be required to maintain adjacent property as an industrial restricted area.

Alternative 4: OFF-SITE LANDFILLING OF SOILS IN EXCESS OF 25 PPM; OFF-SITE THERMAL DESTRUCTION OF SOILS IN EXCESS OF 500 PPM

Capital Cost: \$717,734
Annual O&M Costs: \$1,000
Present Worth: \$747,734
Time to Implement: 13 months

This alternative is similar to

Alternative 3, except that soils containing concentrations of PCBs greater than 500 ppm would be hauled off-site and thermally destroyed in an incineration facility permitted to burn PCBs. Soils in excess of 10 ppm would be capped as in Alternative 2. Deed restrictions would be required to maintain adjacent property as an industrial restricted area.

Alternative 5: ON-SITE BIOREMEDIATION OF SOILS IN EXCESS OF 25 PPM

Capital Cost: \$1,230,220
Annual O&M Costs: \$1,000
Present Worth: \$1,260,220
Time to Implement: 36 months

Soils with PCB concentrations exceeding 25 ppm would be excavated and placed on leaching beds to be constructed on-site. These soils would then be washed with detergents, and the leachate collected. The leachate would then be introduced into a bioreactor, and the leached soil would then be fed into the bioreactor. Soils exceeding 10 ppm that remain on site would be contained in-place, as in Alternative 2. Deed restrictions would be required.

Alternative 6: ON-SITE BIOREMEDIATION OF SOILS IN EXCESS OF 25 PPM; OFF-SITE THERMAL DESTRUCTION OF SOILS IN EXCESS OF 500 PPM

Capital Cost: \$1,288,494
Annual O&M Costs: \$1,000
Present Worth: \$1,318,494
Time to Implement: 24-36 months

This alternative is very similar to Alternative 5, with the exception of soils containing concentrations of PCBs greater than 500 ppm, which would be hauled off-site and thermally destroyed in an incineration facility permitted to burn PCBs. Soils in excess of 10 ppm would be capped as in Alternative 2. Deed restrictions would be required.

Alternative 7: ON-SITE THERMAL DESTRUCTION OF SOILS IN EXCESS OF 25 PPM

Capital Cost: \$1,376,170
Annual O&M Costs: \$1,000
Present Worth: \$1,406,170
Time to Implement: 19 months

Soils exceeding 25 ppm would be excavated and treated by a mobile thermal destruction unit which would

be set up on-site. Soils above 10 ppm that remain on-site will be contained in-place as in Alternative 2. Deed restrictions would be required.

Alternative 8:

OFF-SITE THERMAL DESTRUCTION OF SOILS IN EXCESS OF 25 PPM

Capital Cost: \$2,160,130
Annual O&M Costs: \$1,000
Present Worth: \$2,190,130
Time to Implement: 13 months

This alternative is similar to Alternative 7, however, instead of bringing a mobile thermal treatment unit on-site, the excavated materials would be sent off-site to a facility permitted to incinerate PCBs. Soils above 10 ppm that remain on-site will be contained in-place as in Alternative 2. Deed restrictions would be required.

Alternative 9:

OFF-SITE LANDFILLING OF SOILS IN EXCESS OF 10 PPM

Capital Cost: \$917,830
Annual O&M Costs: \$0
Present Worth: \$917,830
Time to Implement: 13 months

Soils with PCB concentrations above 10 ppm would be excavated and shipped to an off-site TSCA-permitted landfill. Clean fill would be placed in excavated areas, and the area would be paved.

Alternative 10:

OFF-SITE LANDFILLING OF SOILS IN EXCESS OF 10 PPM; OFF-SITE THERMAL DESTRUCTION OF SOILS IN EXCESS OF 500 PPM

Capital Cost: \$995,650
Annual O&M Costs: \$0
Present Worth: \$995,650
Time to Implement: 13 months

Soils that exceed a PCB concentration of 10 ppm would be excavated. Soils below 500 ppm would be shipped to an off-site TSCA-permitted chemical waste landfill. Soil with concentrations above 500 ppm would require treatment at an off-site thermal destruction facility, which is permitted to burn PCBs. Excavated soils would be replaced with clean fill and then the excavated areas, except for the recharge basin would be repaved.

Alternative 11:

ON-SITE BIOREMEDIATION OF SOILS IN EXCESS OF 10 PPM

Capital Cost: \$1,726,310
Annual O&M Costs: \$0
Present Worth: \$1,726,310
Time to Implement: 42 months

Soils that exceed 10 ppm would be excavated and placed on leaching beds to be constructed on-site. These soils would then be washed with detergents, and the leachate collected. The leachate would then be injected into the bioreactor, and the leached soil would then be fed into the bioreactor for treatment by biological breakdown of the contaminants.

Alternative 12:

ON-SITE BIOREMEDIATION OF SOILS IN EXCESS OF 10 PPM; OFF-SITE THERMAL DESTRUCTION OF SOILS IN EXCESS OF 500 PPM

Capital Cost: \$1,784,584
Annual O&M Costs: \$0
Present Worth: \$1,784,584
Time to Implement: 36 - 42 months

This alternative is very similar to Alternative 11, however, soils exceeding 500 ppm would be segregated and shipped off-site for treatment by thermal destruction.

Alternative 13:

ON-SITE THERMAL DESTRUCTION OF SOILS IN EXCESS OF 10 PPM

Capital Cost: \$1,955,660
Annual O&M Costs: \$0
Present Worth: \$1,995,660
Time to Implement: 20 months

Soils exceeding 10 ppm would be excavated and treated by a mobile thermal destruction unit which would be set up on-site.

Alternative 14:

OFF-SITE THERMAL DESTRUCTION OF SOILS IN EXCESS OF 10 PPM

Capital Cost: \$3,306,740
Annual O&M Costs: \$0
Present Worth: \$3,306,740
Time to Implement: 13 months

This alternative is similar to Alternative 13, however, instead of bringing a mobile thermal treatment unit on-site, the excavated materials would be sent off-site to a facility permitted to incinerate PCBs.

All costs are estimated. Implementation times are estimated from the time the Record of Decision is signed.

EVALUATION OF ALTERNATIVES

The preferred alternative for cleaning up the PCB-contaminated soils at the Hooker/Ruco site is Alternative 10 -- Off-site landfilling of approximately 1100 cubic yards of soils with concentrations between 10 ppm and 500 ppm, and off-site thermal destruction of approximately 36 cubic yards of soils in excess of 500 ppm.

In order to ensure the complete removal of material over 10 ppm in the recharge basin, the contaminated soil at the bottom of the basin would be excavated to a depth of 10 feet from the existing surface. Confirmatory sampling would be conducted to ensure that the soils which remain after the excavation would have PCB concentrations not exceeding 10 ppm.

Based on current information, the preferred alternative provides the best balance of trade-offs among the alternatives with respect to the nine criteria that EPA uses to evaluate alternatives. This section profiles the performance of the preferred alternative against the nine criteria, noting how it compares to the other options under consideration. A glossary of the evaluation criteria is noted below.

ANALYSIS

Overall Protection. All of the alternatives, with the exception of the "no-action" alternative, would provide adequate protection of human health and the environment by eliminating, reducing, or controlling risk through treatment, engineering controls, or institutional controls (subject to the performance of treatability studies as to bioremediation). The preferred alternative would remove soils with PCB contamination over 10 ppm, and the area would be paved, thereby reducing the risks associated with direct contact and at the same time minimizing the possibility of exposure to residual PCB contamination.

The "no-action" alternative is not an acceptable remedial alternative given the current risk posed to site workers exceeds the recommended risk range of 10^{-4} to 10^{-6} .

Compliance with ARARs. Except for the "no-action", and containment remedies, all alternatives would meet the applicable or relevant and appropriate requirements of Federal or State environmental laws (although.

treatability studies would be needed to verify the effectiveness of the bioremediation alternatives). TSCA is applicable for the disposal of excavated materials with PCB concentrations over 50 ppm, and therefore, the previously excavated soil could not remain at its current location, nor could it be redeposited on-site without a waiver of TSCA requirements. Applicable TSCA regulations will be complied with during the remediation, because soils between 10 ppm and 500 ppm will be excavated and disposed of in a TSCA-permitted landfill, and soil above 500 ppm will be incinerated. Land Disposal Restrictions (LDRs) would be not be applicable, nor relevant and appropriate because the contaminated soils are not RCRA-restricted wastes.

Long-term effectiveness and permanence. The preferred alternative would reduce the inherent hazards posed by the PCB-contaminated soils at the site. Soils with PCB concentrations

above 10 ppm would no longer be present on site, therefore, the remedy is both effective and permanent. No long-term monitoring or deed restrictions would be required because in a residential future-use scenario, with remaining soils below 10 ppm, the Reasonable Maximum Exposure is calculated to be 1.8×10^{-5} , which is within EPA's acceptable risk range of 10^{-4} to 10^{-6} .

The "no-action" or in-situ containment alternatives would not provide permanent remedies and would require institutional controls, such as deed restrictions. Using 25 ppm for a clean-up level would also necessitate the use of deed restrictions to maintain industrial use of the property.

Reduction of Toxicity, Mobility, or Volume of the Contaminants Through Treatment. Off-site landfilling does not reduce toxicity, mobility or volume of contamination through treatment, but it

greatly reduces the potential for exposure at the site. In the preferred alternative, the most highly contaminated soils would be destroyed by thermal treatment.

Alternatives which would provide for biotreatment or thermal destruction of all the PCB-contaminated soils would be preferred under this criterion, because they reduce the toxicity, mobility and volume of all the PCB contamination through treatment. However, due to the small volume and relatively low contaminant concentration of soils to be addressed, the other balancing factors prevail. Alternative 10, by providing for treatment of the most highly contaminated soil would reduce toxicity, mobility and volume. It should be recognized that all alternatives that include excavation also include backfilling the excavated area with clean fill and repaving the areas (except for the recharge basin) with asphalt, thereby reducing the mobility of any residual contamination.

Short-term effectiveness. Alternative 10 would be effective in the short-term because all soils above 10 ppm would be removed from the site for treatment. No treatability studies would be necessary prior to implementation of the remedy, which enables the remedial action to begin sooner than alternatives that require such studies. The time it would take to excavate and ship this material off-site has been estimated at 25 days.

Bioremediation alternatives would require treatability studies to evaluate the effectiveness of the process, which would lengthen the overall time of the remediation. In addition, the FFS estimated that bioremediation would take several summer seasons to treat the soils down to acceptable levels. On-site incineration would require test burns to verify that acceptable destruction and removal efficiencies could be achieved. This, along with mobilization time, would prolong the time it would take to complete the remedial action.

There is an increased risk of short-term exposure during any alternative that involves excavation of contaminated soils. However this risk could be minimized by using construction practices which control dust emissions.

GLOSSARY OF EVALUATION CRITERIA

- **Overall Protection of Human Health and the Environment:**
This criterion addresses whether or not a remedy provides adequate protection and describes how risks are eliminated, reduced or controlled through treatment, engineering controls or institutional controls.
- **Compliance with ARARs:**
This criterion addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other environmental statutes and/or provide grounds for invoking a waiver.
- **Long-term Effectiveness and Permanence:**
This criterion refers to the ability of the remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.
- **Reduction of Toxicity, Mobility or Volume:**
This criterion addresses the degree to which a remedy utilizes treatment technologies to reduce the toxicity, mobility or volume of contaminants.
- **Short-term Effectiveness:**
This criterion considers the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.
- **Implementability:**
This criterion examines the technical and administrative feasibility of a remedy, including availability of materials and services needed to implement the chosen solution.
- **Cost:**
This criterion includes capital and operation and maintenance costs.
- **State Acceptance:**
This criterion indicates whether, based on its review of the FFS and the Proposed Plan, the State concurs with, opposes, or has no comment on the proposed alternative.
- **Community Acceptance:**
This criterion will be addressed in the Record of Decision following a review of the public comments received on the RI/FS reports and the Proposed Plan.

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Implementability. Implementation of Alternative 10 should be accomplished without difficulty. While it should be recognized that capacity at TSCA-approved landfills and thermal treatment facilities is limited, it should not be a problem given the relatively small volumes of material which are being excavated. Given that there would only be approximately 1100 cubic yards of material to be treated, a pilot study to test the effectiveness of bioremediation would use most of the contaminated soil before that remedy could be officially selected. Alternatives which bring a thermal destruction unit on-site are impractical due to the small volume of material to be treated. Accordingly, the time and expense for mobilization and de-mobilization would be close to that for the actual treatment. Off-site thermal destruction of all contaminated soils could pose delays due to the existing limited capacity at such facilities.

Cost. The cost of the preferred alternative is approximately \$1,000,000. The cost of the other alternatives range from \$105,640 for in-situ containment, to \$3,306,740 for off-site incineration of all soils over 10 ppm.

State Acceptance. The State of New York concurs with this proposed remedy.

Community Acceptance. Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision for the site.

SUMMARY OF THE PREFERRED ALTERNATIVE

In summary, Alternative 10 would achieve substantial risk reduction through the removal of soils contaminated with PCBs above 10 ppm from the site. Soils with concentrations between 10 ppm and 500 ppm would be landfilled at an off-site TSCA-approved facility, and soils with PCB concentrations over 500 ppm would be thermally destroyed at an off-site TSCA-approved thermal treatment facility.

Soils at the bottom of the recharge basin would be excavated to a depth of 10 feet from the existing surface to ensure the complete removal of material over 10 ppm in the basin. Confirmatory sampling would be conducted to ensure that the soils which remain after the excavation would have PCB concentrations not to exceed 10 ppm. Excavated areas would be filled with clean soil and then, these areas, except for the recharge basin, would be paved with asphalt as appropriate.

This alternative is believed to provide the best balance of trade-offs among the alternatives with respect to the evaluation criteria. Based on the information available at this time, EPA believes the preferred alternative would be protective of human health and the environment, would comply with ARARs, would be cost effective, and would utilize permanent technologies to the maximum extent practicable. Because it would treat the most grossly contaminated material, it also would meet the statutory preference for the use of a remedy that involves treatment as a principal element.

COMMUNITY ROLE IN THE SELECTION PROCESS

EPA and NYSDEC rely on public input to ensure that the remedy selected for each Superfund site is fully understood and that the agencies have considered the concerns of the local community, as well as ensuring that the selected remedy provides an effective solution.

EPA has set a public comment period from July 31, 1990 to August 30, 1990 to encourage public participation in the selection process. This Proposed Plan, the FFS Report, and the Endangerment Assessment are being made available to the public during the public comment period. Written comments on EPA's preferred alternative, as well as other alternatives will be welcomed through August 30, 1990, and if received by that date, will be considered in the Record of Decision (ROD) which will formally document the selected remedy for the PCB-contaminated areas of the

site. All written comments should be addressed to:

U.S. Environmental Protection Agency
Region II - Room 747
26 Federal Plaza
New York, New York 10278

Attn: Douglas Tomchuk
Hooker/Ruco Site Public Comments

EPA, in consultation with NYSDEC, may modify the preferred alternative or select another response action presented in the Proposed Plan and the FFS Report based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives, including EPA's preferred alternative, identified here.

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